

SCARING & CARMAN PLLC

ATTORNEYS AT LAW

SUITE 501

666 OLD COUNTRY ROAD

GARDEN CITY, N. Y. 11530-2004

(516) 683-8500

FAX

(516) 683-8410

STEPHEN P. SCARING, P.C.
SUSAN SCARING CARMAN

MATTHEW W. BRISSENDEN
OF COUNSEL

sscaring@scaringlaw.com
scarman@scaringlaw.com

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 6/14/2021

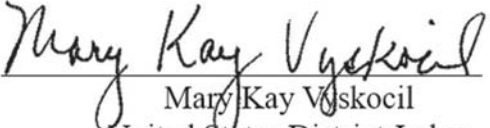
June 10, 2021

BY ECF

Hon. Mary Kay Vyskocil
United States District Court Judge
for the Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

GRANTED. SO ORDERED.

Date: 6/14/2021
New York, New York


Mary Kay Vyskocil
United States District Judge

Re: United States v. Navarro, et al.
20-CR-00160

Dear Judge Vyskocil:

Please accept this application for a modification to the defendant's current bail conditions. The defendant's 12-year-old daughter is a very active soccer and lacrosse player and a member of soccer and lacrosse travel teams. His daughter's soccer team won the state championship on June 5. Yesterday, the defendant found out that his daughter's soccer team is scheduled to play in the United States Youth Soccer Regional Championship, which is to take place on June 21 and, assuming they win, the championship tournament runs from June 28 through July 1. The soccer team will continue to play until they lose and are eliminated. The games will be held at the Tuckahoe Turf Farms, 401 Myrtle Avenue, Hammonton, New Jersey. The times for the games have not yet been set.

We are seeking the following modifications: If her game is scheduled to occur after 11:00 a.m. on Friday, June 25, they can make the trip in one day. However, should her game be scheduled prior to 11:00 a.m., they are requesting the opportunity to travel Thursday, June 24, and return home on Friday, June 25. If her team performs well, they will advance in the tournament and would be required to play from June 28 through July 1, until they lose and are eliminated. The defendant's wife is currently employed at City MD and is not able to take her daughter to the games on weekdays. This particular soccer league is based in Queens County, and the defendant lives in Nassau County. Because of the distance, he does not have close friends that he can rely upon and trust to assume responsibility for his daughter's travel. He also has no family in New York. In this application, we are only asking for permission to travel on

Hon. Mary Kay Vyskocil
June 10, 2021
Page 2

Friday, June 25 and, if the team is successful, on June 28. We will make a further request for bail modification based upon the team's success.

The defendant has abided by all of his bail conditions. We have notified the Government and Pre-Trial Services and they have no objection.

Please consider our application to modify the bail conditions to accommodate the schedule outlined in this submission.

Thank you.

Respectfully submitted,

Stephen P. Scaring

STEPHEN P. SCARING

cc: AUSA Andrew Adams (by email and ECF)
Pre-Trial Services Officer Marnie Gerardino (by email)
SPS/cn